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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)	No. CR-08-00862 SBA
)	
12 Plaintiff,)	STIPULATION AND ORDER FOR
)	CONTINUANCE AND EXCLUSION OF
13 vs.)	TIME UNDER THE SPEEDY TRIAL
)	ACT, 18 U.S.C. 3161 ET. SEQ.
14 CONNELL BRADLEY)	
)	Current Date: March 3, 2009
15 Defendant.)	Requested Date: March 24, 2009
_____)	

16

17 The parties in the above-captioned matter are scheduled to appear before the Court on
18 March 3, 2009 at 9:00 a.m. The parties stipulate and agree that the matter should be continued to
19 March 24, 2009 because (1) defense counsel just received voluminous records from Ohio, (2) the
20 Ohio records are not in any easily identifiable order and, although they contain many documents
21 that are not relevant to this case, there are some documents that will be necessary and it has been
22 time-consuming to sort them, (2) defense counsel has a Ninth Circuit argument on March 9 and
23 therefore will not be able to sufficiently focus on Mr. Bradley's matter by March 3, (3)
24 government counsel is in trial the week of March 16, (4) discovery provided by the government
25 covers seven different robberies with seven separate sets of evidence and it is taking the parties
26 additional time to sort through and weigh the relative strength of each charged, and (5) the

1 parties are confident that the matter will resolve by plea rather than trial, but those plea
 2 negotiations have not progressed sufficiently for resolution by March 3. The parties are
 3 optimistic that the terms of an agreement could be reached by March 24. For all of these
 4 reasons, the parties stipulate and agree that the ends of justice served by the continuance
 5 requested herein outweigh the best interest of the public and the defendant in a speedy trial
 6 because the failure to grant the continuance would deny the counsel for the defendant the
 7 reasonable time necessary for effective preparation, taking into account the exercise of due
 8 diligence. The parties therefore stipulate and agree that time should be excluded pursuant to 18
 9 U.S.C. §§ 3161(h)(8)(A) and (B)(iv).

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 11 /S/

12 Date: February 25, 2009

Rebecca Sullivan Silbert
 Assistant Federal Public Defender
 /S/

14 Date: February 25, 2009

Christine Wong
 Assistant United States Attorney

16 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
 17 “conformed” signature (/S/) within this e-filed document.


18
 19 Based on the reasons provided in the stipulation of the parties above, the Court hereby
 20 FINDS that the ends of justice served by the continuance requested herein outweigh the best
 21 interest of the public and the defendant in a speedy trial because the failure to grant the
 22 continuance would deny the counsel for the defendant the reasonable time necessary for effective
 23 preparation, taking into account the exercise of due diligence. The Court makes this finding
 24 based on the time needed for defense counsel to review the Ohio records, the time needed for
 25 defense counsel’s appeal and government counsel’s trial, the need for the parties to sort through
 26

1 the discovery on the multiple charges in this case, and the continuing negotiations of the parties.

2 Based on these findings, IT IS HEREBY ORDERED THAT the above-captioned matter
3 is continued to March 24, 2009 at 9:00 a.m., and that time is excluded from March 3, 2009 to
4 March 24, 2009 pursuant to 18 U.S.C. §§3161(h)(8)(A) and (B)(iv).

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6 IT IS SO ORDERED.

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9 2/26/09
10 Date


11 Honorable Saundra Brown Armstrong
12 Judge, United States District Court
13 Northern District of California
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